



Advocates for Workplace Fairness

November 15, 2019

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
500 Pearl Street, Chambers 1350  
New York, NY 10007

**Re: Ulke Rowe v. Google LLC, Case No. 1:19-cv-08655-LGS**

Dear Judge Schofield:

Counsel for Plaintiff and Defendant jointly write to request an adjournment of the preliminary conference in this case, which is currently scheduled for November 21, 2019 at 10:40 a.m., as well as the Court's related order that the Parties file their joint letter and proposed Case Management Plan and Scheduling Order no later than November 18, 2019 at 10:00 a.m.

Plaintiff has received a Notice of Right to Sue from the Equal Employment Opportunity Commission and, consequently, intends to file an amended complaint in this action. Additionally, this case is subject to the Second Amended Standing Administrative Order, 11-Misc-003 (S.D.N.Y. Oct. 1, 2015) and the Initial Discovery Protocols for Employment Cases Alleging Adverse Action. An adjournment will promote efficiency as the information and documents exchanged in the initial discovery will aid the Parties in drafting the case management plan and scheduling order, as contemplated by the Standing Order incorporated into the Initial Discovery Protocols for Employment Cases Alleging Adverse Action. This is the Parties' first request for an adjournment.

The Parties have conferred and stipulated to the following schedule and respectfully request that the Court So Order the Proposed Schedule.

	<b>Original Date:</b>	<b>Proposed Date:</b>
Plaintiff to File First Amended Complaint		November 22, 2019
Defendant to File Answer to Plaintiff's First Amended Complaint		December 6, 2020
Completion of Initial Discovery pursuant to Pilot Project Protocols		January 7, 2020

The Honorable Lorna G. Schofield

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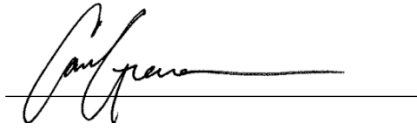
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Filing of joint letter and proposed Case Management Plan and Scheduling Order		January 13, 2020
Preliminary Conference	November 21, 2019	On or after January 13, 2020
Completion of Meditation		February 14, 2020

Respectfully submitted,



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New York, NY 10017  
*Counsel for the Plaintiff*

cc: All parties (via ECF)

SO ORDERED:

\_\_\_\_\_  
The Honorable Lorna G. Schofield

\_\_\_\_\_  
Date

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Southern District of New York  
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